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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

NICOLE BROWN-ADAMS,
Plaintiff,

vs.

RAIDERS FOOTBALL CLUB, LLC; and
DOES 1-50, inclusive,
Defendants.

Case No.:

**COMPLAINT FOR DAMAGES
(DEMAND FOR JURY TRIAL)**

COMES NOW, Plaintiff Nicole Brown-Adams (“Plaintiff”) files this civil action against Defendants, and each of them, for violations of Title VII of the Civil Rights Act of 1964 (42 U.S.C. § 2000e et. seq.) Title VII of the Civil Rights Act of 1991 (42 U.S.C. § 1981 et. seq.) Nevada Revised Statutes 613.330 et. seq. and related claims under Nevada law seeking damages and alleges as follows:

JURISDICTION AND VENUE

1. The jurisdiction of this Court is invoked pursuant to 28 U.S.C. §§ 1331, 1343 and 24 U.S.C. §2000e-5(f)(3), which confer original jurisdiction on federal district courts in suits to address deprivation of rights, privileges and immunities secured by the United States Constitution and federal law.

1 employer and is an “employer” within the meaning of Title VII and related claims under Nevada
2 law. Defendant is located at 1475 Raiders Way, Henderson, Nevada 89052.

3 10. Plaintiff is ignorant of the true names and capacities, whether individual, corporate,
4 associate, or otherwise, of DOES 1 through 50, inclusive. The Plaintiff is informed and believes
5 and thereon alleges that each of the fictitiously named Defendants are in some way responsible
6 for, or participated in, or contributed to, the matters and things complained of herein, and is legally
7 responsible in some manner. Plaintiff will seek leave to amend this Complaint when the true
8 names, capacities, participation and responsibilities have been ascertained.

9 **STATEMENT OF FACTS**

10 11. Plaintiff, a Black female, started her employment with Defendant on or about
11 February 2016, as an Administrative Assistant. Plaintiff was later promoted to Human Resources
12 Coordinator.

13 12. On June 1, 2020, Defendant again promoted Plaintiff to Human Resources Junior
14 Generalist.

15 13. Plaintiff excelled at her duties as an Administrative Assistant, Human Resources
16 Coordinator and Human Resources Junior Generalist.

17 14. In August 2020, Plaintiff noticed through her work that a female attorney was being
18 paid less than her male counterpart. Plaintiff complained to management of the disparity of pay
19 between the female and male attorneys.

20 15. Also in August 2020, shortly after Plaintiff advised management of the disparity in
21 pay between male and female attorneys, Defendant conducted an “investigation” into Plaintiff’s
22 use of relocation bonus checks for corporate housing.¹ No other employees were investigated for
23 using their relocation bonus checks in the same manner.

24 16. Then, also in August 2020, Defendant issued a written warning to Plaintiff for the
25 manner in which she extended an offer of employment to an applicant when extending such offers
26 was part of her job duties and responsibilities.

27
28

¹ Plaintiff received two bonus checks to assist in relocating from Oakland to Las Vegas as part of the Raiders move to Nevada.

26. As a direct and proximate result of Defendants retaliation against Plaintiff, she suffered and will continue to suffer economic damages and non-economic damages including anxiety, humiliation, and emotional distress.

27. Plaintiff is thereby entitled to general and compensatory damages in amounts to be proven at trial.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, Karl M. Jordan, prays that this Court grant the following relief:

1. Economic Loss for Back Pay and Front Pay, plus prejudgment interest;
2. Compensatory Damages;
3. Reasonable attorneys' fees;
4. Punitive damages;
5. Costs of suit incurred herein; and
6. Such other and further relief as the court deems just and proper

DATED this 27th day of December 2022.

WATKINS & LETOFSKY, LLP

/s/ Daniel R. Watkins

By: _____

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Nicole Brown-Adams

REQUEST FOR JURY TRIAL

Pursuant to Federal Rules of Civil Procedure 38(b) and 42 U.S.C. §1981s, Plaintiff hereby demands a trial by jury in this action on all issues so triable.

DATED this 27th day of December 2022. WATKINS & LETOFSKY, LLP

/s/ Daniel R. Watkins

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